

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, A CITIZEN OF AFGHANISTAN )  
CURRENTLY RESIDING IN NORTH ) Civil Action No. 3:22-CV-49  
CAROLINA, BY AND THROUGH NEXT )  
FRIENDS, JOHN AND JANE DOE; AND )  
JOHN AND JANE DOE, CITIZENS OF ) Judge Norman K. Moon  
AFGHANISTAN AND LEGAL GUARDIANS )  
OF BABY DOE, ) Magistrate Judge Joel C. Hoppe  
)  
*Plaintiffs,* )  
)  
v. )  
)  
JOSHUA MAST, STEPHANIE MAST, )  
RICHARD MAST, KIMBERLEY MOTLEY, )  
AND AHMAD OSMANI, )  
)  
*Defendants,* )  
)  
and )  
)  
UNITED STATES SECRETARY OF STATE )  
ANTONY BLINKEN AND UNITED STATES )  
SECRETARY OF DEFENSE GENERAL )  
LLOYD AUSTIN, )  
*Nominal* )  
*Defendants.* )  
)

**NON-PARTY PIPE HITTER FOUNDATION INC.'S MOTION TO QUASH  
SUBPOENA OR FOR ENTRY OF A PROTECTIVE ORDER**

## Introduction

Non-Party Pipe Hitter Foundation, Inc. (“Pipe Hitter”) respectfully moves this Court to quash the subpoena with which Plaintiffs have served it in the above-captioned case, insofar as the subpoena seeks testimony. *See Subpoena to Testify at a Deposition in a Civil Action* (Exh. 1). Pipe

Hitter has already provided objections and responses to the subpoena's request for production and timely completed its production of documents, totaling 639 pages.

Counsel for Pipe Hitter certifies that it conferred in good faith with Plaintiffs' counsel in an attempt to resolve this motion and narrow the areas of disagreement. Plaintiffs' counsel declined to consent to the requested relief.

Plaintiffs' counsel did not consent to Pipe Hitter's request to submit this motion without a hearing pursuant to W.D. Va. L.Cv.R. 11(b).

A brief and proposed order are attached.

July 18, 2023

Respectfully submitted,

/s/ Dan Backer  
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*\*Application for pro hac vice  
admission forthcoming.*